

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

FRANCES NICOLE SPRAYBERRY,)

Plaintiff.)

vs.)

RALPH CAMPANIO ,)

Defendant.)

2017 NOV -8 A 11: 12

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Civil Action No.: 3:17-cv-762-WKW-SRW

COMPLAINT

NOW COMES the Plaintiff, Frances Nicole Sprayberry and states her claims for relief against the Defendants as follows:

1. This Court has jurisdiction of this controversy on grounds that the Plaintiff is an individual resident citizen of the State of Alabama, and that the Defendant, Ralph Campanio, is an individual resident citizen of Florida who committed tortious acts in this state and district as set forth below. The amount in controversy exceed \$75,000.00 exclusive of interest and costs. This Court has jurisdiction under 28 U.S.C. §1332, based on diversity of citizenship and amount in controversy.

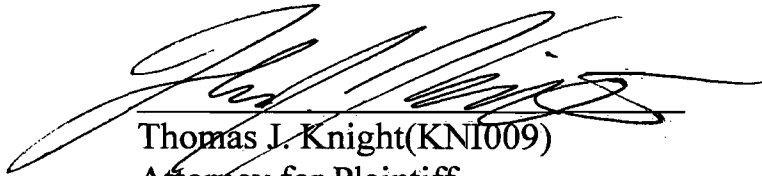
2. On or about the 6th day of September, 2017, on a public highway in Randolph County, Alabama namely Highway 431, inside the city of Roanoke, the

Defendant, did negligently, recklessly and wantonly cause or allow a motor vehicle, namely a 2007 Chevy Silverado automobile, Vehicle Identification Number: 1GVKREC3EZ306605, which was owned by the Defendant, Ralph Campanio himself, to collide with a motor vehicle then being driven, occupied and operated by Plaintiff, Frances Nicole Sprayberry. The vehicle occupied and driven by the Plaintiff, Frances Nicole Sprayberry, a 2014 Nissan Altima automobile, Vehicle Identification Number: 1N4AL3AP0EC427179, and was owned by Mr. Shane Burke.

3. As a proximate consequence of the negligence, recklessness, and wantonness and other conduct of the Defendant, Ralph Campanio, Plaintiff, Frances Nicole Sprayberry was seriously injured and had to seek medical attention and suffered damage to her property.

4. Defendant acted grossly negligently, wantonly and otherwise such that they are liable to Plaintiff for punitive damages as well as for the losses described herein. Defendant Ralph Campino, is liable for all the damages suffered by Plaintiff Frances Nicole Sprayberry, both compensatory and punitive.

WHEREFORE, Plaintiff, Frances Nicole Sprayberry, demands judgment against the Defendant, jointly and severally, in the sum of \$250,000.00, plus costs of this action.



Thomas J. Knight(KNI009)

Attorney for Plaintiff

Hubbard & Knight

1125 Noble Street

Anniston, Al 36207

Phone: (256) 237-9586

hubbardknight@msn.com



Steven R. Morris (MOR122)

Attorney for Plaintiff

205 S Main Street

Wedowee, Alabama 36278

(256) 237-9586

Defendant may be served at the following addresses:

Ralph Campanio

33810 Linda Lane

Leesburg, Florida 64788